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# UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff,

Criminal No: 1:19-CR-140

v.

(J. CONNOLLY)

KEITH THOMAS DOUGHERTY,

Defendant.

# SUPERSEDING INDICTMENT

The Grand Jury charges that:

### COUNT ONE

(Mailing Threatening Communications)

On or about the 6th day of May, 2017, in the Middle District of Pennsylvania, the defendant, KEITH THOMAS DOUGHERTY, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, or knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, dated May 5, 2017, addressed to Christopher Conner, who is the Chief Judge of the United States District Court for the Middle District of Pennsylvania, and containing a threat to injure Chief Judge Christopher Conner, and other members of the federal judiciary, all in violation of Section 876(c) of Title 18 of the United States Code.

### **COUNT TWO**

(Interstate Communication with Threat to Injure)

On or about the 21st day of March, 2019, in the Middle District of Pennsylvania, the defendant, **KEITH THOMAS DOUGHERTY**, knowingly and willfully did transmit in interstate and foreign commerce via electronic mail, an electronic mail communication to Federal Bureau of Investigations Special Agent Christopher Cruz, and the communication contained a threat to injure Judge Joy F. Conti, United States District Judge for the Western District of Pennsylvania, specifically "Just like Ruby Ridge Keith Dougherty will be required to order 'a sniper' ... under the 2nd Amendment to 'shoot Conti in the head [just] to 'shut her up,'" all in violation of Section 875(c) of Title 18 of the United States Code.

# **COUNT THREE**

(Interstate Communication with Threat to Injure)

On or about the 19th day of November, 2019, in the Middle District of Pennsylvania, the defendant, **KEITH THOMAS DOUGHERTY**, knowingly and willfully did transmit in interstate and foreign commerce via electronic mail, an electronic mail communication to Federal Bureau of Investigations Special Agent Christopher Cruz, and the communication contained a threat to injure Chief Judge Christopher Conner, Chief United States District Judge for the Middle District of Pennsylvania, specifically "If you say 'Keith Dougherty must first hunt down Chief Conner as the 'visiting Judge in DE' ... beat him to death 'with bare hands' ... and then be found not guilty by a 6th Amendment Jury' ... before any action is 'taken in the Wilson v. Sellers Sense' .. [just] write it down," all in violation of Section 875(c) of Title 18 of the United States Code.

### COUNT FOUR

(Interstate Communication with Threat to Injure)

On or about the 22nd day of January 2020, in the Middle District of Pennsylvania, the defendant, **KEITH THOMAS DOUGHERTY**, knowingly and willfully did transmit in interstate and foreign commerce via electronic mail, an electronic mail communication to Caleb Curtis Enerson, Pennsylvania Office of the Attorney General, and the communication contained a threat to injure Judge Joy F. Conti, United States District Judge for the Western District of Pennsylvania, specifically "The 'crux of the matter is Keith Dougherty 'avers' ... he 'could shoot Judge Conti'... in the Head and claim necessity ... under PA's 'Discretionary Deadly Force'...Doctrine,'" all in violation of Section 875(c) of Title 18 of the United States Code.

A true bill,

Foreperson, Grand Jury

WILLIAM J. POWELL

UNITED STATES ATTORNEY

Jeffrey A. Finucane

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Northern District of West Virginia